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Attorney for the Material Witness(es)

United States District Court
Southern District of California

(Hon. Barbara L. Major)

UNITED STATES OF AMERICA,)	Criminal Case No. 08CR0300DMS(BLM)
)	
Plaintiff,)	Notice Of Motion And Motion To Take
)	The Videotape Depositions Of The Material
v.)	Witnesses And Thereafter Release Them
)	From Custody
DIEGO COLIO-JIMENEZ, et al.,)	
)	Date: April 3, 2008
Defendants.)	Time: 9:00 a.m.
)	Judge: Barbara L. Major
)	Room: A

Notice Of Hearing

On April 3, 2008 at 9:00 a.m., or as soon thereafter as counsel may be heard, material witnesses Damian Garcia-Garcia, Erika Garcia-Garcia, and Jane Doe(Nieves Montano-Salas) [the "Material Witnesses"], by and through attorney Ned Lynch, specially appearing for attorney Marilyn B. Gunner, will bring a motion for a court order to conduct videotaped depositions of the Material Witnesses. This motion will be heard by Hon. Barbara L. Major in Courtroom A of the U.S. District Court for the Southern District of California.

Motion

The Material Witnesses, by and through attorney Ned Lynch, specially appearing for attorney Marilyn B. Gunner, and pursuant to Federal Rules of Criminal Procedure 15 and 18 U.S.C. § 3144, move this court for an order to take videotaped depositions of the Material Witnesses and thereafter release them from custody at the conclusion of the depositions for their return to their home country.

This motion is based upon this notice, the memorandum of points and authorities filed in support of this motion, the declaration of attorney Ned Lynch, the files and records in the case noted above, and any and all other evidence and arguments that may be brought to the court's attention prior to or during the hearing on this motion.

Dated: March 19, 2008

S/Ned Lynch

Ned Lynch, specially appearing as the
attorney for the Material Witnesses
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